MICHAEL RODAK, JR.

IN THE

Supreme Court of the United States

OCTOBER TERM, 1972

No. 72-419

PITTSBURGH PRESS COMPANY, *Petitioner*

v.

THE PITTSBURGH COMMISSION ON HUMAN RELATIONS AND THE CITY OF PITTSBURGH and THE NATIONAL ORGANIZATION FOR WOMEN, INC., *Respondents*

MOTION FOR LEAVE TO FILE BRIEF AMICUS CURIAE

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PRESS OF BYRON S. ADAMS PRINTING, INC., WASHINGTON, D. C.

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The International Association of Official Human Rights Agencies hereby respectfully moves for leave to file the attached brief amicus curiae in this case. The consent of all Respondents has been obtained. The consent of the attorney for Petitioner was requested, but no response was ever forthcoming.

The interest of the International Association of Official Human Rights Agencies (IAOHRA) arise because it is an umbrella organization consisting of state and local civil rights agencies throughout the country. Included in IAOHRA's active membership are the following contributing agencies: State of Alaska Commission for Human Rights, Connecticut Commission on Human Rights and Opportunities, Iowa Civil Rights Commission, Kentucky Commission on Human Rights, Michigan Commission on Civil Rights, State of Maryland Commission on Human Relations, and the State

of Nebraska Equal Opportunity Commission. All the foregoing agencies are charged with protecting and advancing the cause of human rights including enforcement responsibilities for state civil rights laws dealing with such matters as employment, housing and public accommodations. These agencies are similar in function, if not identical, to the Pittsburgh Commission on Human Relations. The issues raised in these proceedings involves whether or not a newspaper may encourage constitutionally and statutorily forbidden discrimination. Also, significant questions are raised as to the extent to which states and localities may attempt to end discrimination by attacking not only those who discriminate but those who make discrimination possible. Reversal of the decision below could result in advertising which promotes sex and race distinctions affecting the enforcement responsibilities of state and local civil rights agencies.

Respectfully submitted,

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